

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
Vernice Stewart : No. 17-18385-JKF
Debtor :

OBJECTION TO CERTIFICATE OF DEFAULT

The Debtor Objects to the Certificate of Default on the following basis

1) Debtor has her own insurance and has paid her own taxes. The debtor has shown the insurance directly to the mortgage company and as such it would be inappropriate to grant relief in this case.

WHEREFORE Debtor respectfully requests this Honorable Court not grant the relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 10/27/20

CERTIFICATE OF SERVICE

The Chapter 13 Trustee and Rebecca Solarz, Esq are being served with a copy of this Objection.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 10/27/20